

Crawford & Associates Engineering, PC

Engineering Consultants, Planners, Geologists & Surveyors

Hudson Office - 551 Warren St. • Suite 301 • Hudson, NY 12534

Tel: (518) 828-2700 • Fax: (518) 828-2723 • www.crawfordandassociates.com

Clifton Park Office - 1 Barney Rd. • Suite 109 • Clifton Park, NY 12065

Tel: (518) 982-1301 • Fax: (518) 828-2723 • www.crawfordandassociates.com

PRINCIPAL

David J. Crawford, PE (NY, MA, VT)

ASSOCIATES

Brandee K. Nelson, PE, LEED (NY)

Andrew P. Aubin, PE, LEED (NY, VT)

Daniel J. Russell, LS

Email: Edwards.Nathaniel@epa.gov

February 2, 2015

U.S. Environmental Protection Agency - Region 2
Clean Air and Sustainability Division
Hazardous Waste Programs Branch
290 Broadway, 22nd Floor
New York, NY 10007-1866
Attn.: RCRA Notifications

2015 FEB - 2 P 3: 16
RCRA PROGRAMS
BRANCH
ENVIRONMENTAL PROTECTION
AGENCY REGION II

Re: USEPA ID Number NYD986899912 – Deactivation Request (Operations Ceased)
C&A #: 4063.01

Dear Sir/Madam:

On behalf of **TCI of NY, LLC** (TCI), Crawford and Associates Engineering, P.C. (C&A) are submitting this request to deactivate USEPA ID Number **NYD986899912**.

Please let me know if you require any additional information in order to grant this request. I can be contacted at (518) 828-2700, ext. 126 or at kpunchar@crawfordandassociates.com. I look forward to receiving confirmation of the deactivation.

Sincerely,

CRAWFORD & ASSOCIATES ENGINEERING, P.C.

Kimberly Punchar

Kimberly Punchar
Senior Environmental Scientist
& Assistant Project Manager
Environmental & Planning Group

CC:

Brian Hemlock, TCI [39 Falls Industrial Park Road, Hudson, NY 12534]
Lisa Leone-Beers, TCI [PO Box 936, Coeymans, NY 12045]

H:\WORK\4063.01\Deactivate EPA ID Number\Letter to Deactivate EPA ID Number February 2015 Hudson Facility.docx



Region 2

**ACKNOWLEDGEMENT OF NOTIFICATION
OF
HAZARDOUS WASTE ACTIVITY**

07/14/2008

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER: NYD986899912

INSTALLATION NAME: TCI OF NY LLC

INSTALLATION ADDRESS : 39 FALLS INDUSTRIAL PARK RD
HUDSON, NY 12534

MAILING ADDRESS : 39 FALLS INDUSTRIAL PARK RD
HUDSON, NY 12521

EPA Form 8700-12AB (4-80)

**USEPA - REGION 2
RCRA Programs Branch
290 Broadway, 22nd Floor
New York, NY 10007-1866**

**ATTN: RCRA NOTIFICATIONS
Tel : (212) 637-4106
Fax: (212) 637-4437**

**TO: TCI OF NY LLC
or Current Occupant
ATTN: BRUCE VETRO
39 FALLS INDUSTRIAL PARK RD
HUDSON, NY, 12534**

**SEND COMPLETED****FORM TO:**The Appropriate State or
EPA Regional Office.

United States Environmental Protection Agency

RCRA SUBTITLE C SITE IDENTIFICATION FORM**1. Reason for Submittal**
(See instructions on page 13.)MARK ALL BOX(ES)
THAT APPLY**Reason for Submittal:**

- ☐ To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities)
- ☒ To provide Subsequent Notification of Regulated Waste Activity (to update site identification information)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)
- ☐ As a component of the Hazardous Waste Report

2. Site EPA ID Number
(page 14)**EPA ID Number**

NY D 9 8 6 8 9 9 9 1 2

3. Site Name
(page 14)**Name:**

TCI of NY, LLC

4. Site Location Information
(page 14)**Street Address:** 39 Falls Industrial Park Road**City, Town, or Village:** Hudson**State:** NY**County Name:** Columbia**Zip Code:** 12534**5. Site Land Type**
(page 14)**Site Land Type:** ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other**6. North American Industry Classification System (NAICS) Code(s) for the Site**
(page 14)**A.**

5 0 9 3

B.

| | | | |

C.

| | | | |

D.

| | | | |

7. Site Mailing Address
(page 15)**Street or P. O. Box:** 39 Falls Industrial Park Road**City, Town, or Village:** Hudson**State:**

NY

Country:

US

Zip Code:

12534

8. Site Contact Person
(page 15)**First Name:**

Bruce

MI:**Last Name:**

Vetro

Phone Number:

518-828-9997

Extension:**Email address:****9. Operator and Legal Owner of the Site**
(pages 15 and 16)**A. Name of Site's Operator:**

TCI of NY, LLC

Date Became Operator (mm/dd/yyyy):

12/1/2006

Operator Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other**B. Name of Site's Legal Owner:**

TCI Realty of NY, LLC

Date Became Owner (mm/dd/yyyy):

12/01/2006

Owner Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

9. Legal Owner (Continued) Address	Street or P. O. Box: 39 Falls Industrial Park Road	
	City, Town, or Village: Hudson	
	State: NY	
	Country: US	Zip Code: 12534

10. Type of Regulated Waste Activity
Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)

A. Hazardous Waste Activities
Complete all parts for 1 through 6.

☐ **1. Generator of Hazardous Waste**
If "Yes", choose only one of the following - a, b, or c.

☐ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or

☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or

☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities.

☐ d. United States Importer of Hazardous Waste

☐ e. Mixed Waste (hazardous and radioactive) Generator

☒ **2. Transporter of Hazardous Waste**

☐ **3. Treater, Storer, or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.

☐ **4. Recycler of Hazardous Waste (at your site)**

☐ **5. Exempt Boiler and/or Industrial Furnace**
If "Yes", mark each that applies.

☐ a. Small Quantity On-site Burner Exemption

☐ b. Smelting, Melting, and Refining

☐ **6. Underground Injection Control**

B. Universal Waste Activities

☐ **1. Large Quantity Handler of Universal Waste** (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste mark all boxes that apply:

	<u>Manage</u>
a. Batteries	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>
c. Mercury containing equipment	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>

☐ **2. Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities
Mark all boxes that apply.

☒ **1. Used Oil Transporter**
If "Yes", mark each that applies.

☐ a. Transporter

☐ b. Transfer Facility

☐ **2. Used Oil Processor and/or Re-refiner**
If "Yes", mark each that applies.

☐ a. Processor

☐ b. Re-refiner

☐ **3. Off-Specification Used Oil Burner**

☒ **4. Used Oil Fuel Marketer**
If "Yes", mark each that applies.

☒ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner

☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (See instructions on page 21.)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

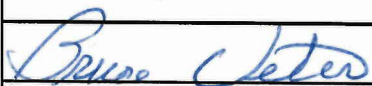
B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Comments (See instructions on page 21.)

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11).

(See instructions on page 21.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Bruce Vetro, Facility Manager	6/11/2008

TCI of NY, LLC
39 Falls Industrial Park Road
Hudson, NY 12534

2015 JUN 17 PM 3:16

June 9, 2008

Mr. Jack Hoyt
USEPA
290 Broadway
NYC, NY 10007

RE: Change to RCRA Subtitle C Site Identification Form

Dear Mr. Hoyt:

Attached is an updated 8700-12 form for TCI of NY, LLC. There have been two changes to our site identification form. The mailing address zip code is incorrect on the "Acknowledgement of Notification of Hazardous Activity"; please note the correct one on the attached 8700. The second change is on page 2, Used Oil Activities. Please note that TCI of NY is now a used oil fuel marketer.

Please make note of these changes and forward a new "Acknowledgement of Notification of Hazardous Activity" once completed.

If you should have any questions regarding this request, please feel free to contact me at 518-828-9997.

Sincerely,



Patricia Phesay
Administrative Assistant



**ACKNOWLEDGEMENT OF NOTIFICATION
OF
HAZARDOUS WASTE ACTIVITY**

04/08/2008

Region 2

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER: NYD986899912

INSTALLATION NAME: TCI OF NY LLC

INSTALLATION ADDRESS : 39 FALLS INDUSTRIAL PARK RD
HUDSON, NY 12534

MAILING ADDRESS : 39 FALLS INDUSTRIAL PARK RD
HUDSON, NY 12521

EPA Form 8700-12AB (4-80)

USEPA - REGION 2
RCRA Programs Branch
290 Broadway, 22nd Floor
New York, NY 10007-1866

ATTN: RCRA NOTIFICATIONS
Tel : (212) 637-4106
Fax: (212) 637-4437

TO: TCI OF NY LLC
or Current Occupant
ATTN: BRUCE VETRO
39 FALLS INDUSTRIAL PARK RD
HUDSON, NY, 12534

2008 FEB 19 AM 11:33

RCRA: HAVEN
BRANCH

TCI of NY, LLC
39 Falls Industrial Park Road
Hudson, NY 12534

Mr. Jack Hoyt
USEPA
290 Broadway
NYC, NY 10007

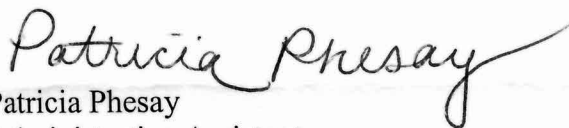
RE: Change to RCRA Subtitle C Site Identification Form

Dear Mr. Hoyt:

Per our phone conversation, I recently noticed an error on our RCRA Subtitle C Site Identification Form. Our zip code currently reads, 12521, it should be 12534. Can you please make this correction and send me a corrected Acknowledgement of Notification at your earliest convenience. I apologize for this inconvenience.

If you should have any questions regarding this request, please feel free to contact me at 518-828-9997.

Sincerely,



Patricia Phesay
Administrative Assistant



Region 2

**ACKNOWLEDGEMENT OF NOTIFICATION
OF
HAZARDOUS WASTE ACTIVITY**

01/12/2007

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA ID. NUMBER: NYD986899912

INSTALLATION NAME: TCI OF NY LLC

INSTALLATION ADDRESS : 39 FALLS INDUSTRIAL PARK RD
HUDSON, NY ~~42524~~

MAILING ADDRESS : 39 FALLS INDUSTRIAL PARK RD
HUDSON, NY ~~42524~~

EPA Form 8700-12AB (4-80)

*corrected &
Ack gen.*

USEPA - REGION 2
RCRA Programs Branch
290 Broadway, 22nd Floor
New York, NY 10007-1866

ATTN: RCRA NOTIFICATIONS
Tel : (212) 637-4106
Fax: (212) 637-3056

TO: TCI OF NY LLC
or Current Occupant
ATTN: BRUCE VETRO
39 FALLS INDUSTRIAL PARK RD
HUDSON, NY 12521



Region 2

**ACKNOWLEDGEMENT OF NOTIFICATION
OF
HAZARDOUS WASTE ACTIVITY**

08/05/2008

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER: NYD986899912

INSTALLATION NAME: T C I OF NY LLC

**INSTALLATION ADDRESS : 39 FALLS INDUSTRIAL PARK RD
HUDSON, NY 12534**

**MAILING ADDRESS : 39 FALLS INDUSTRIAL PARK RD
HUDSON, NY 12521**

EPA Form 8700-12AB (4-80)

**USEPA - REGION 2
RCRA Programs Branch
290 Broadway, 22nd Floor
New York, NY 10007-1866**

**ATTN: RCRA NOTIFICATIONS
Tel : (212) 637-4106
Fax: (212) 637-4437**

**TO: T C I OF NY LLC
or Current Occupant
ATTN: BRUCE VETRO
39 FALLS INDUSTRIAL PARK RD
HUDSON, NY, 12534**

**SEND COMPLETED****FORM TO:**The Appropriate State or
EPA Regional Office.

United States Environmental Protection Agency

RCRA SUBTITLE C SITE IDENTIFICATION FORM**1. Reason for Submittal**
(See instructions on page 13.)MARK ALL BOX(ES)
THAT APPLY**Reason for Submittal:**

- ☐ To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities)
- ☒ To provide Subsequent Notification of Regulated Waste Activity (to update site identification information)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)
- ☐ As a component of the Hazardous Waste Report

2. Site EPA ID Number (page 14)

EPA ID Number

NY D 9 8 6 8 9 9 9 1 2

3. Site Name (page 14)

Name:

TCI of NY, LLC

4. Site Location Information (page 14)

Street Address: 39 Falls Industrial Park Road

City, Town, or Village: Hudson

State: NY

County Name: Columbia

Zip Code: 12534

5. Site Land Type (page 14)Site Land Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other**6. North American Industry Classification System (NAICS) Code(s) for the Site** (page 14)

A. 5 0 9 3

B.

C.

D.

7. Site Mailing Address (page 15)

Street or P. O. Box: 39 Falls Industrial Park Road

City, Town, or Village: Hudson

State: NY

Country: USA

Zip Code: 12534

8. Site Contact Person (page 15)

First Name: Bruce

MI: Last Name: Vetro

Phone Number: 518-828-9997

Extension:

Email address:

9. Operator and Legal Owner of the Site (pages 15 and 16)

A. Name of Site's Operator:

TCI of NY, LLC

Date Became Operator (mm/dd/yyyy):

12/01/2006

Operator Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

B. Name of Site's Legal Owner:

TCI Realty of NY, LLC

Date Became Owner (mm/dd/yyyy):

12/01/2006

Owner Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

EPA ID NO: NY D 986899912

OMB#: 2050-0028 Expires 06/30/2009

9. Legal Owner (Continued) Address	Street or P. O. Box: <u>39 Falls Industrial Park Road</u>	
	City, Town, or Village: <u>Hudson</u>	
	State: <u>NY</u>	
	Country: <u>USA</u>	Zip Code: <u>12534</u>

10. Type of Regulated Waste Activity

Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)

A. Hazardous Waste Activities

Complete all parts for 1 through 6.

Y ☐ N ☒ 1. Generator of Hazardous Waste

If "Yes", choose only one of the following - a, b, or c.

☐ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.)
of non-acute hazardous waste; or☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.)
of non-acute hazardous waste; or☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.)
of non-acute hazardous waste

In addition, indicate other generator activities.

Y ☐ N ☒ d. United States Importer of Hazardous WasteY ☐ N ☒ e. Mixed Waste (hazardous and radioactive) GeneratorY ☒ N ☐ 2. Transporter of Hazardous WasteY ☐ N ☒ 3. Treater, Storer, or Disposer of
Hazardous Waste (at your site) Note: A
hazardous waste permit is required for this
activity.Y ☐ N ☒ 4. Recycler of Hazardous Waste (at your
site)Y ☐ N ☒ 5. Exempt Boiler and/or Industrial Furnace
If "Yes", mark each that applies.☐ a. Small Quantity On-site Burner
Exemption☐ b. Smelting, Melting, and RefiningY ☐ N ☒ 6. Underground Injection Control

B. Universal Waste Activities

Y ☐ N ☒ 1. Large Quantity Handler of Universal Waste (accumulate
5,000 kg or more) [refer to your State regulations to
determine what is regulated]. Indicate types of universal
mark all boxes that apply:Managea. Batteries ☐b. Pesticides ☐c. Mercury containing equipment ☐d. Lamps ☐e. Other (specify) _____ ☐f. Other (specify) _____ ☐g. Other (specify) _____ ☐Y ☐ N ☒ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

Mark all boxes that apply.

Y ☒ N ☐ 1. Used Oil Transporter
If "Yes", mark each that applies.☒ a. Transporter☒ b. Transfer FacilityY ☐ N ☒ 2. Used Oil Processor and/or Re-refiner
If "Yes", mark each that applies.☐ a. Processor☐ b. Re-refinerY ☐ N ☒ 3. Off-Specification Used Oil BurnerY ☒ N ☐ 4. Used Oil Fuel Marketer

If "Yes", mark each that applies.

☒ a. Marketer Who Directs Shipment of
Off-Specification Used Oil to
Off-Specification Used Oil Burner☐ b. Marketer Who First Claims the
Used Oil Meets the Specifications

EPA ID NO: NYD986899912

OMB#: 2050-0028 Expires 06/30/2009

11. Description of Hazardous Wastes (See instructions on page 21.)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

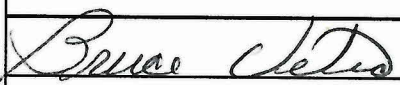
B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Comments (See instructions on page 21.)

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11).

(See instructions on page 21.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Bruce Vetro, Facility Manager	07/22/2008

2008 JUL 29 AM 5:22
STATION

TCI of NY, LLC
39 Falls Industrial Park Road
Hudson, NY 12534

July 22, 2008

Mr. Jack Hoyt
USEPA
290 Broadway
NYC, NY 10007

RE: Change to RCRA Subtitle C Site Identification Form

Dear Mr. Hoyt:

Attached is an updated 8700-12 form for TCI of NY, LLC. There have been changes to our site identification form. The change is under Used Oil Activities, number 1, TCI is a used oil transporter and a transfer facility. The second change is that TCI is only a marketer who directs shipment of off-specification used oil to off-specification used oil burner.

Please make note of these changes and forward a new "Acknowledgement of Notification of Hazardous Activity" once completed.

I apologize for the changes made to your 8700-12 form. If you should have any questions regarding this request, please feel free to contact me at 518-828-9997.

Sincerely,



Patricia Phesay
Administrative Assistant

MODE = MEMORY TRANSMISSION

START=JAN-19 12:40

END=JAN-19 12:46

FILE NO.=651

STN NO.	COMM.	ABBR NO.	STATION NAME/TEL NO.	PAGES	DURATION
001	634	2	5188289979	000/001	00:00:00

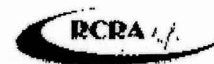
-DEPP RCRA PROG BR -

RCRAInfo > Searches

- ***** - 212 637 3056- *****
Page 1 of 1



Handler Search



Select the options with which to search:

All searches are based on an "and" condition and wildcards are assumed. (Ending % signs are not needed.)

Handler ID: nyd986899912	Handler Name: TCI OF NY LLC	
Street Number: 39	Street Name: FALLS INDUSTRIAL	
City: HUDSON	State: NEW YORK	Zip:
County: Select County	State District:	Second
<input type="checkbox"/> Check this box to search on active sites only.		

[Search](#) [Reset Form](#) [Back to Main Menu](#)

Page: 1

There are 1 handlers. Select the handler to process.

	Act Loc	▲ Handler ID ▼	▲ Handler Name ▼	▲ Address ▼	▲ City ▼	▲ State ▼	▲ County ▼	Active Status	In a Universe	Controls in Place
1	NY	NYD986899912	TCI OF NY LLC	39 FALLS INDUSTRIAL PARK RD	HUDSON	NY	COLUMBIA	H---	Y	N

FAX 518 828 9979

URL: /rcrainfo/searches/search.jsp

*Per Joe Hoyer
US EPA*



Handler Search



Select the options with which to search:

All searches are based on an "and" condition and wildcards are assumed. (Ending % signs are not needed.)

Handler ID: nyd986899912	Handler Name: <i>TCI OF NY LLC</i>	
Street Number: 39	Street Name: FALLS INDUSTRIAL	
City: HUDSON	State: NEW YORK	Zip:
County: Select County	State District:	Second
<input type="checkbox"/> Check this box to search on active sites only.		

[Search](#) [Reset Form](#) [Back to Main Menu](#)

Page: 1

There are 1 handlers. Select the handler to process.

	Act Loc	▲ Handler ID ▼	▲ Handler Name ▼	▲ Address ▼	▲ City ▼	▲ State ▼	▲ County ▼	Active Status	In a Universe	Controls in Place
1	NY	NYD986899912	TCI OF NY LLC	39 FALLS INDUSTRIAL PARK RD	HUDSON	NY	COLUMBIA	H----	Y	N

FAX 518 828 9979

URL: /rcrainfo/searches/search.jsp

*Per Jack Hoyt
US EPA*

U.S. EPA
AGENCY RO II

94 JUN 13 PM 3:06

INFO. SERV. SEC.

NYD 986899912

JUN 07 1994

Mr. David Laskin
President
TCI, Incorporated
R.D. #3 Box 153T
Hudson, New York 12534

RE: TCI, Incorporated
R.D. #3 Box 153T
Hudson, New York 12534
Notice of Deficiency

Dear Mr. Laskin:

This letter is a Notice of Deficiency (NOD) detailing our comments on the application for approval as a commercial storer of PCB waste submitted by TCI, Inc. in July 1990.

The following are our comments:

Personnel and Compliance History:

The key personnel listed in the application are:

David Laskin, President, CEO
Bruce Vetro, Plant Manager

Please confirm or amend this list. Please expand the resumes to show the training location, presenter of training and certification of training.

Provide technical background, past five years employment history and compliance history, as specified in 40 C.F.R. § 761.65(d)(3) for any additions to the above mentioned list.

Any additions to the compliance history since the application was submitted must be included in the response to the NOD.

All references to compliance history are based on the definition provided in 40 C.F.R. § 761.65(d)(3)(iv).

Storage Capacities:

The application presents somewhat inconsistent information about the maximum storage capacity at this facility. Page 3 states that the maximum PCB capacity is 11,000 gallons of oil, page 11 states 11,075 gallons and 500-600 transformers, and Section 4.1 states 11,060 gallons and 600 transformers. The applicant should revise the application to clarify the maximum storage capacity at the facility. Specify a consistent number of transformers and volume of PCB oil to be stored at the facility.

Based on EPA's inspections of the facility, TCI has discontinued bulk storage of PCBs. Please confirm this.

The maximum drum storage capacity must be shown in the response.

Storage Limits:

In developing your storage limits, the values must be based on the maximum to be stored at any one time and is the basis used for closure costs.

The same comments as under "Storage Capacities" apply here. The quantities of PCBs and types of containers must reflect current practice.

It is important to understand that these maximum storage amounts have two impacts. First, they limit the maximum storage, even if additional capacity exists. Second, they affect closure costs.

The application does not include any designated 40 C.F.R. § 761.65(c)(1) and/or (2) areas for storage of PCBs outside of a 40 C.F.R. § 761.65(b) area. EPA prefers that PCB storage in 40 C.F.R. § 761.65(c)(1) and/or (2) areas be limited to electrical generators. If any such storage is to be included, please specify the location and why it is necessary.

Design Qualifications:

Please identify the sealant used on the concrete and which areas are sealed. The applicant should provide information to demonstrate that this compound will prevent or minimize penetration of the joints by PCBs.

The application does not discuss the walls of the facility, which must be adequate to prevent rain water infiltration to PCB areas. The applicant should provide information on the construction of the facility's walls.

Closure Plan:

Note that spills at the facility must be cleaned up in accordance with the PCB Spill Cleanup Policy. Cleanup at closure should not find significant contamination.

The closure plan should be amended to show the current storage configuration.

The closure plan does not include a schedule for closure. A closure schedule should be included to complete closure within 180 days. A provision may be included to address more extensive problems, such as groundwater contamination, if these problems are anticipated. If contamination beyond what is reasonably related to the storage areas is discovered, an extension for closure may be requested at that time.

Decontamination:

The closure plan should contain a detailed listing of all the equipment to be decontaminated during closure, and should note which items will be decontaminated and which will be shipped for disposal.

The closure plan and cost estimate present inconsistent information regarding the amount of waste produced by decontamination activities. Section 5 shows a different amount of waste produced from that shown in Section 8. The amounts shown in the cost estimate do not agree with Sections 5 and 8.

Sampling:

The description of the pre-cleanup sampling survey contained in the closure plan should indicate the number of random samples to be taken and their locations.

The application does not adequately describe the proposed post-cleanup sampling scheme, or address its validity. The applicant should revise the closure plan to provide more detail regarding sampling procedures.

Other Closing Activities:

The applicant should provide information discussing groundwater at the facility and should describe efforts taken to ensure that groundwater contamination will not occur.

The closure cost estimate indicates a cost for a closure report and PE certification. The closure plan should be revised to show this activity.

Closure Cost:

Verify that current market costs were used for all items discussed in the closure cost estimate (i.e., transportation, sampling, labor, etc.).

Specify if the closure cost estimate is based on a third party performing the closure activities as required by 40 C.F.R. § 761.65(f)(1)(ii).

If the maximum quantity of PCBs to be stored at the facility is amended, revise the closure cost estimate to account for the change accordingly. The cost of final closure is at the point in the facility's active life when the extent and manner of operations would make closure the most expensive (see 40 C.F.R. § 761.65(f)(1)(i)).

If areas are designated for temporary storage under 40 C.F.R. § 761.65(c)(1) and/or pallet storage under 40 C.F.R. § 761.65(c)(2), the cost of disposing, decontaminating and sampling these areas will need to be accounted for in the closure cost estimate.

If decontamination/sampling activities are to be conducted for the roadways, parking areas and loading and unloading areas at the site, incorporate the costs for these activities into the closure cost estimate accordingly.

The cost of disposal, decontamination and sampling needs to be more specific. Some of the following items will affect the costs and need to be specified: labor, number of personnel to perform each task, supervision, personal protective equipment, number of sampling points, number of inspections by independent certified engineer, disposal of decontaminated liquids (i.e., detergent, wash and rinse water), solid residues collected by vacuuming and disposable equipment (i.e., mops, squeegees, buckets and plastic sheeting).

Clarify the cost for removing the transformers (item #1). Is the cost of PPM, Inc. accepting, removing and transporting the transformers and transformer oil included in the closure cost estimate? If the cost of removing, transporting and disposing of the transformers is not included in the cost of item #1, amend the closure cost estimate accordingly.

Specify the distances to the disposal destinations and the cost per mile to reach the disposal sites when calculating the costs for transportation.

Does the cleaning of the storage tank include the cost of cleaning both the interior and exterior? How many workers will be used to clean the tank? There should be at a minimum two workers (one of whom will be waiting outside the manway in case of an emergency) and one supervisor for cleaning activities for the tank. The cost of the cleaning fluid is not included. Account for the disposal or decontamination and sampling of the secondary containment system for the tank. Amend the closure cost estimate to account for these matters accordingly.

Amend the closure cost estimate to account for the decontamination and sampling of non-porous pipes, pumps, fittings, drains and other equipment. The closure plan specifies that 5 drums of solvent will be used to decontaminate the piping, etc. and 10 drums of contaminated solids will be produced. Specify the cost for purchasing the solvent and transporting and disposing of the contaminated solids.

The closure plan states that porous components/surfaces of equipment that have been in direct contact with PCB contaminated fluids will be stripped, cut and drummed for disposal. Amend the closure cost estimate to account for the removal, transportation and disposal of the estimated 30 drums of material indicated in the closure plan.

Is the cost of transporting and disposing of the tank farm liner included in item #4? If not, amend accordingly.

The cost estimate does not include the cost of decontaminating non-disposal equipment (e.g., trowels, drill rig equipment, augers and drum handling equipment) and cleaning equipment (e.g., steam cleaner, vacuum equipment). If certain pieces of equipment are to be disposed, adjust the closure cost estimate accordingly to account for the disposal cost.

Does the decontamination of the floors (item #6) include all 28,400 ft² specified in the closure plan and the interior walls of the building? The cost of renting the cleaning equipment and purchasing the cleaning fluid is not specified.

Specify the number and costs of personnel protection suits, respirators, SCBA equipment and rescue equipment, etc. (item #7)

Verify the amount of cleaning fluid and wash and rinse water being disposed (items #8 & 9). The cost estimate does not include the cost of sampling the decontaminated liquids (i.e., detergent, wash and rinse water) to be generated during facility decontamination, amend accordingly.

Verify the cost of analyzing each sample (item #12), the cost of \$25/sample seems a low estimate for a lab analysis.

The number of random samples to be taken during the pre-cleanup sampling survey will affect the closure cost estimate. Once the number of random samples are incorporated into the closure plan, the cost per sample will need to be accounted for in the closure cost estimate.

Revisions to the post-cleanup sampling scheme will affect the closure cost estimate. The number of workers, collecting of samples, number of samples and analysis of samples will need to be accounted for accordingly.

Since a groundwater quality investigation will need to be conducted if assessment or sampling activities or results indicate that such contamination is likely, the cost of groundwater activities will need to be accounted for in the closure cost estimate. The cost of installation, development, sampling and analysis of groundwater monitoring wells will need to be included in the closure cost estimate.

The closure cost estimate includes an additional cost of 10% to the subtotal to account for contingency. Instead, amend the total closure cost estimate to account for a combined contingency and administrative cost of 25%.

In general, the closure cost estimate will increase from year-to-year due to inflation. Amend the total closure cost estimate to account for inflation. Annually, the closure cost estimate must be recalculated to adjust for inflation using the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of

Commerce in its "Survey of Current Business", as promulgated in 40 C.F.R. § 761.65(f).

Financial Assurance:

The following provisions apply to the closure trust fund chosen by TCI, Inc. as the financial assurance mechanism (see 40 C.F.R. § 761.65(g)(1)):

The first payment into the trust fund must be made within 30 calendar days after EPA has notified the facility of its conditional approval. Interim approval to operate is canceled and the application is denied if EPA does not receive verification that the payment was made in that 30-day period.

The first payment shall be at least equal to the current closure cost estimate, divided by the number of years in the pay-in period.

Subsequent payments shall be made no later than 30 days after each anniversary date of the first payment made into the trust fund.

TCI, Inc. should be cognizant that the requirements of 40 C.F.R. § 264.143(a), except for paragraph (a)(3) of 40 C.F.R. § 264.143, must be satisfied when establishing a closure trust fund.

As outlined in 40 C.F.R. § 264.143(a), an originally signed duplicate of the trust agreement, with wording specified in 40 C.F.R. § 264.151(a)(1), must be submitted to the Regional Administrator. Furthermore, the trust agreement must be accompanied by a formal certification of acknowledgement (for example, see 40 C.F.R. § 264.151(a)(2)).

Miscellaneous:

If flammable liquids are stored at the facility, please indicate where such storage is in relation to the PCB storage areas.

Resolve the discrepancy regarding the facility curbing. Page 4 of the application states that the curb height is four inches; the closure states six inches. To be in compliance with 40 C.F.R. § 761.65(b), the PCB containment areas must be surrounded by a continuous six inch high curb.

Information provided in response to comments in the NOD should be referenced (i.e., keyed to the NOD) and a list provided of the referenced answers stating their location in the revised commercial storer application.

Please submit a written clarification to EPA of the issues cited in this letter and appropriate revision's to TCI Inc.'s commercial storer application by July 25, 1994.

If there are any questions regarding this review, please contact Paul Spitaleri at (908) 906-6891, Emmet Keveney at (212) 264-9603 or David Greenlaw at (908) 906-6817.

Sincerely,

Andrew Bellina, P.E.
Chief, Hazardous Waste Facilities Branch
Air and Waste Management Division

cc: Ernest A. Regna, Chief
Pesticides and Toxic Substances Section

bcc: Andrew Bellina (2AWM-HWF)
Stanley Siegel (2AWM-HSWP)
Elizabeth Van Rabenswaay (2AWM-HSWP)
John Gorman (2AWM-HWC)
George Meyer (2AWM-HWC)
Doug Pocze (2AWM-HWF)
John Brogard (2AWM-HWF)
Emmet Keveney (2AWM-HWF)
Dan Kraft (ES-PTS)
Joseph Clore (OPM-ISS)

USEPA REGION 1
JUL 10 PM 3:01

MAR 10 1995

Mr. David Laskin
President
TCI, Incorporated
R.D. #3 Box 153T
Hudson, New York 12534

RE: TCI, Incorporated
R.D. #3 Box 153T
Hudson, New York 12534
EPA's response to TCI's comments to NOD
EPA I.D.#: NYD986899912

Dear Mr. Laskin:

The United States Environmental Protection Agency (USEPA) has received your response to EPA's Notice of Deficiency (NOD) on the application for approval as a commercial storer of PCB for TCI, Incorporated dated October 3, 1994. This letter is a second Notice of Deficiency (NOD) detailing our comments on the amended September 1994 application for approval as a commercial storer of PCB waste submitted by TCI, Inc. on October 3, 1994.

The following are our comments:

Storage Area:

The dimensions of the diked area and the diameter of the two storage tanks must be specified. This information is needed to ensure that the diked volume meets the requirements of 40 C.F.R. § 761.65(b)(1)(ii).

The closure plan states the XR-5 liner inside the diked tank farm will be removed and disposed of as PCB waste. The application must address the removal of that part of the liner that is installed beneath the tanks. If the liner does not extend beneath the tanks, then that must be stated.

Temporary Storage:

It is not clear in the application if transformers filled with PCB-contaminated oil are brought to the facility and subsequently drained to drums and the 3000 gallon storage tank. If this is the case, then the staging area for transformer draining or pumpout must be specified. However, if only PCB-contaminated **drained** transformers are admitted to the facility, then a statement to this effect should be made.

Closure Plan:

The application states that the sampling plan at closure is based on a 37 point grid in accordance with EPA-560/5-86-017, *Verification of PCB Spill Cleanup By Sampling and Analysis*. This report provides guidelines for cleaning up PCB spills, with particular emphasis on the sampling design and analysis methods to be used for the cleanup of PCB spills. The spill cleanup areas used to develop these guidelines were generally small; over 98 percent of the sampling areas were less than 1300 square feet. The sampling scheme in the Closure Plan is not appropriate since the sampling area is approximately 160,000 square feet.

The sampling plan should be revised to include sampling of interior PCB handling and storage areas using a grid of approximately ten feet by ten feet. Initially only 50 percent of the grid point locations are to be sampled based on a random selection and analyzed. If analysis indicates PCB levels above 10 mg/100 cm², additional decontamination and resampling must be performed.

For sampling areas outside of the building, sampling of roadways and parking areas should be based on a grid of twenty feet by twenty feet. The grid shall be laid out to locate the maximum number of grid points on the areas to be sampled. All exterior grid point samples should be analyzed. If analysis indicates PCB levels above 10 mg/100 cm², additional decontamination and resampling must be performed.

The sampling points identified by the above ten and twenty foot grids replace the sampling points identified in the application based on the 160,000 square foot circle.

Judgmental samples outside the building shall include any areas where sediments have accumulated and soils within one foot of paved areas at low points. These areas tend to accumulate PCBs if they are present.

Closure Cost:

TCI is correct in stating that the transformers, once drained of the residual fluid (50-499 ppm PCBs), are not regulated. However, the cost of removing, transporting and disposing of the 600 PCB-contaminated drained transformers as municipal solid waste needs to be included in the cost of item #1. The closure cost estimate must account for the point in the PCB storage facility's active life when the extent and manner of PCB storage operations would make closure the most expensive (see 40 C.F.R. § 761.65(f)(1)(i)). Amend the closure cost estimate accordingly.

TCI correctly specified 40 C.F.R. § 761.60(c)(2) as allowing the disposal of containers as municipal solid waste once drained of PCB-contaminated (less than 500 ppm PCBs) fluids. However, the cost of removing, transporting and disposing of the tanks and/or containers as municipal solid waste needs to be included in the cost of item #3. The closure cost estimate must account for the point in the PCB storage facility's active life when the extent and manner of PCB storage operations would make closure the most expensive (see 40 C.F.R. § 761.65(f)(1)(i)). Amend the closure cost estimate accordingly.

As specified under the aforementioned section, "Storage Area", if a liner exists beneath the storage tanks, the cost of removing, transporting and disposing of this liner will need to be included in the closure cost estimate.

As specified under the aforementioned section, "Temporary Storage", if there exists a staging area where transformers are drained, the cost of disposing, decontaminating and sampling of this area will need to be accounted for in the closure cost estimate.

TCI, Inc. indicates that sampling will occur for the roadways, parking areas and unloading areas. However, the cost of decontaminating and/or removing, transporting and disposing of the paved and graveled areas if sampling results in PCB concentrations exceeding threshold values specified in EPA clean-up guidelines needs to be included. The closure cost estimate must account for the point in the PCB storage facility's active life when the extent and manner of PCB storage operations would make closure the most expensive (see 40 C.F.R. § 761.65(f)(1)(i)). Amend the closure cost estimate accordingly.

Once TCI, Inc. has revised the sampling plan pursuant to our recommendations specified under the section "Closure Plan", the closure cost estimate will need to be revised accordingly. The closure cost will need to be adjusted to account for the increased number of sampling points, increased labor hours to collect the samples and the increased number of samples to be analyzed.

TCI incorporated a combined contingency and administrative cost of 25% to the closure cost estimate. However, the combined contingency and administrative cost needs to be included to the entire subtotal. The subtotal consists of Items 1 to 12 and item 14 (Closure Report & PE Certification) upon which the 25% is then added for a total closure cost estimate.

Financial Assurance:

Once the closure cost estimate has been revised, the closure fund chosen by TCI, Inc will need to be amended to account for the increased cost.

The following provisions apply to the closure trust fund chosen by TCI, Inc. as the financial assurance mechanism (see 40 C.F.R. § 761.65(g)(1)):

As outlined in 40 C.F.R. § 264.143(a), an originally signed duplicate of the trust agreement, with wording specified in 40 C.F.R. § 264.151(a)(1), must be submitted to the Regional Administrator. Schedule A, as specified in 40 C.F.R. § 264.151(a)(1), requires TCI, Inc. to list the EPA Identification Number, name, address, and the current closure cost estimate, or portions thereof, for which financial assurance is demonstrated. Amend Schedule A to indicate the facility's EPA Identification Number and to specify the current closure cost estimate.

As TCI, Inc. clearly stated in Schedule B of their amended September 1994 application for approval, the trust agreement must be accompanied by a formal certification of acknowledgement. TCI, Inc. should submit a draft copy of the certification of acknowledgement as specified in 40 C.F.R. § 264.151(a)(2) so EPA can verify that the wording therein is clearly expressed.

Information provided in response to comments in the NOD should be referenced (i.e., keyed to the NOD) and a list provided of the referenced answers stating their location in the revised commercial storer application.

Please submit a written clarification to EPA of the issues cited in this letter and appropriate revision's to TCI Inc.'s commercial storer application by April 6, 1995.

If there are any questions regarding this review, please contact Mr. Paul Spitaleri at (908) 906-6891, Mr. Emmet Keveney at (212) 264-9603 or Mr. David Greenlaw at (908) 906-6817.

Sincerely,

Andrew Bellina, P.E.
Chief, Hazardous Waste Facilities Branch
Air and Waste Management Division

cc: Ernest A. Regna, Chief
Pesticides and Toxic Substances Section

bcc: Andrew Bellina (2AWM-HWF)
George Meyer (2AWM-HWC)
John Gorman (2AWM-HWC)
John Brogard (2AWM-HWF)
Emmet Keveney (2AWM-HWF)
Stanley Siegel (2AWM-HSWP)
Elizabeth Van Rabenswaay (2AWM-HSWP)
Dan Kraft (ES-PTS)
Joseph Clore (2AWM-HWF)✓

LIZ,
FYI!

EIK

JLF
2/21/98

NYD 986 899 912

December 15, 1997

Dear Mr. Keveney:

Enclosed is our original copy of our Surety Bond Guaranteeing Closure for our Closure Bond. David Greenlawn suggested that we send it to your attention.

We would like to thank you in advance and if you need further information please don't hesitate to contact us at (518) 828-9997.

Have a great holiday season.

Sincerely,

David Laskin, President
TCI Inc.

SURETY BOND GUARANTEEING CLOSURE

Date bond executed: December 11, 1997

Effective date: November 1, 1997

Principal: TCI, Inc., 39 Falls Industrial Park Road, Hudson, NY 12534

Type of organization: Corporation

State of incorporation: New York

Surety(ies): Frontier Insurance Company

Business address: 195 Lake Louise Marie Road, Rock Hill, NY 12775-8000

EPA Identification Number: NYD986899912

Facility name: TCI, Inc.

Address: 39 Falls Industrial Park Road, Hudson, NY 12534

Total penal sum of closure guarantee: \$ 40,900.50

Total penal sum of post-closure guarantee: \$ N/A

Total penal sum of bond: \$ 40,900.50

Surety's bond number: 116605

Know All Persons By These Presents, That we, the Principal and Surety(ies) hereto are firmly bound to the U.S. Environmental Protection Agency (hereinafter called EPA), in the above penal sum for the payment of which we bind ourselves, our heirs, executors, administrators, successors, and assigns jointly and severally; provided that, where the Surety(ies) are corporations acting as co-sureties, we, the Sureties, bind ourselves in such sum "jointly and severally" only for the purpose of allowing a joint action or actions against any or all of us, and for all other purposes each Surety binds itself, jointly and severally with the Principal, for the payment of such sum only as is set forth opposite the name of such Surety, but if no limit of liability is indicated, the limit of liability shall be the full amount of the penal sum.

Whereas said Principal is required, under the Toxic Substance Control Act as amended (TSCA), to have a permit or interim status in order to own or operate each PCB Commercial Storage Facility identified above, and

Whereas said Principal is required to provide financial assurance for closure, or closure and post-closure care, as a condition of the permit or interim status, and

Whereas said Principal shall establish a standby trust fund as is required when a surety bond is used to provide such financial assurance;

Now, Therefore, the conditions of this obligation are such that if the Principal shall faithfully, before the beginning of final closure of each facility identified above, fund the standby trust fund in the amount(s) identified above for the facility.

Or, if the Principal shall fund the standby trust fund in such amount(s) within 5 days after a final order to begin closure is issued by an EPA Regional Administrator or a U.S. district court or other court of competent jurisdiction.

Or, if the Principal shall provide alternate financial assurance, as specified in Subpart H of 40 CFR Part 264 or 265, as applicable, and obtain the EPA Regional Administrator's written approval of such assurance, within 90 days after the date notice of cancellation is received by both the Principal and the EPA Regional Administrator(s) from the Surety(ies), then this obligation shall be null and void, otherwise it is to remain in full force and effect.

The Surety(ies) shall become liable on this bond obligation only when the Principal has failed to fulfill the conditions described above. Upon notification by an EPA Regional Administrator that the Principal has failed to perform as guaranteed by this bond, the Surety(ies) shall place funds in the amount guaranteed for the facility(ies) into the standby trust fund as directed by the EPA Regional Administrator.

The liability of the Surety(ies) shall not be discharged by any payment or succession of payments hereunder, unless and until such payment or payments shall amount in the aggregate to the penal sum of the bond, but in no event shall the obligation of the Surety(ies) hereunder exceed the amount of said penal sum.


The Surety(ies) may cancel the bond by sending notice of cancellation by certified mail to the Principal and to the EPA Regional Administrator(s) for the Region(s) in which the facility(ies) is (are) located, provided, however, that cancellation shall not occur during the 120 days beginning on the date of receipt of the notice of cancellation by both the Principal and the EPA Regional Administrator(s), as evidenced by the return receipts.

The Principal may terminate this bond by sending written notice to the Surety(ies), provided, however, that no such notice shall become effective until the Surety(ies) receive(s) written authorization for termination of the bond by the EPA Regional Administrator(s) of the EPA Region(s) in which the bonded facility(ies) is (are) located.

Principal and Surety(ies) hereby agree to adjust the penal sum of the bond yearly so that it guarantees a new closure and/or post-closure amount, provided that the penal sum does not increase by more than 20 percent in any one year, and no decrease in the penal sum takes place without the written permission of the EPA Regional Administrator(s).

In Witness Whereof, The Principal and Surety(ies) have executed this Financial Guaranty Bond and have affixed their seals on the date set forth above.

The persons whose signatures appear below hereby certify that they are authorized to execute this surety bond on behalf of the Principal and Surety(ies) and that the wording of this surety bond is identical to the wording specified in 40 CFR 264.151(c), as such regulations were constituted on the date this bond was executed.

Signature(s):  Principal

Name(s): DAVID LASKIN

Title(s): PRESIDENT

[Corporate Seal]

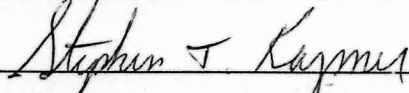
Corporate Surety(ies)

Name: Frontier Insurance Company

Address: 195 Lake Louise Marie Road, Rock Hill, NY 12775-8000

State of incorporation: New York

Liability limit: \$3,500,000.00

Signature(s): 

Name(s): Stephen T. Kazmer

Title(s): Attorney-in-Fact

[Corporate Seal]

Bond Premium: \$614.00

POWER OF ATTORNEY

Know All Men By These Presents: That FRONTIER INSURANCE COMPANY, a New York Corporation, having its principal office in Rock Hill, New York, pursuant to the following resolution, adopted by the Board of Directors of the Corporation on the 4th day of November, 1985:

"RESOLVED, that the Chairman of the Board, the President, or any Vice President be, and hereby is, authorized to appoint Attorneys-in-Fact to represent and act for and on behalf of the Company to execute bonds, undertakings, recognizances and other contracts of indemnity and writings obligatory in the nature thereof, and to attach thereto the corporate seal of the Company, in the transaction of its surety business;

"RESOLVED, that the signatures and attestations of such officers and the seal of the Company may be affixed to any such Power of Attorney or to any certificate relating thereto by facsimile, and any such Power of Attorney or certificate bearing such facsimile signatures or facsimile seal shall be valid and binding upon the Company when so affixed with respect to any bond, undertaking, recognizance or other contract of indemnity or writing obligatory in the nature thereof;

"RESOLVED, that any such Attorney-in-Fact delivering a secretarial certification that the foregoing resolutions still be in effect may insert in such certification the date thereof, said date to be not later than the date of delivery thereof by such Attorney-in-Fact."

This Power of Attorney is signed and sealed in facsimile under and by the authority of the above Resolution.

DOES HEREBY MAKE, CONSTITUTE AND APPOINT:

Lewis James Scheer Michael J. Scheer Alice Rhoads

James I. Moore Bonnie Kruse Stephen T. Kazmer Dawn L. Morgan

of **La Grange**, in the State of **Illinois**,
its true and lawful Attorney(s)-in-Fact with full power and authority hereby conferred in its name, place and stead to sign, execute, acknowledge and deliver in its behalf, and as its act and deed, without power of redelegation, as follows:

Bonds guaranteeing the fidelity of persons holding places of public or private trust; guaranteeing the performance of contracts other than insurance policies; and executing or guaranteeing bonds and undertakings required or permitted in all actions or proceedings or by law allowed; IN AN AMOUNT NOT TO EXCEED THREE MILLION FIVE HUNDRED THOUSAND (\$3,500,000.00) DOLLARS; and to bind FRONTIER INSURANCE COMPANY thereby as fully and to the same extent as if such bond or undertaking was signed by the duly authorized officers of FRONTIER INSURANCE COMPANY, and all the acts of said Attorney(s)-in-Fact pursuant to the authority herein given are hereby ratified and confirmed.

In Witness Whereof, FRONTIER INSURANCE COMPANY of Rock Hill, New York, has caused this Power of Attorney to be signed by its President and its Corporate seal to be affixed this **18th** day of **June**, 19 **90**.

FRONTIER INSURANCE COMPANY

State of New York
County of Sullivan

ss.:



BY:


WALTER A. RHULEN, President

On this **18th** day of **June**, 19 **90**, before the subscriber, a Notary Public of the State of New York in and for the County of Sullivan, duly commissioned and qualified, came WALTER A. RHULEN of FRONTIER INSURANCE COMPANY to me personally known to be the individual and officer described herein, and who executed the preceding instrument, and acknowledged the execution of the same, and being by me duly sworn, deposed and said, that he is the officer of the Company aforesaid, and that the seal affixed to the preceding instrument is the Corporate Seal of the Company, and the Corporate Seal and signature as an officer were duly affixed and subscribed to the said instrument by the authority and direction of the Corporation, and that the resolution of the Company, referred to in the preceding instrument, is now in force.

In Testimony Whereof, I have hereunto set my hand, and affixed my official seal at Rock Hill, New York, the day and year above written.





CHRISTINE I. LANE
Notary Public State of New York
Sullivan County Clerk's No. 1996
Commission Expires May 2, 1998

CERTIFICATION

I, JOSEPH P. LOUGHLIN, Secretary of FRONTIER INSURANCE COMPANY of Rock Hill, New York, do hereby certify that the foregoing Resolution adopted by the Board of Directors of this Corporation and the Powers of Attorney issued pursuant thereto, are true and correct, and that both the Resolution and the Powers of Attorney are in full force and effect.

In Witness Whereof, I have hereunto set my hand and affixed the facsimile seal of the corporation this **11th** day of **December**, 19 **97**.




JOSEPH P. LOUGHLIN, Secretary

STATE OF ILLINOIS }
 } S.S.
COUNTY OF COOK }

On December 11, 1997, before me, a Notary Public in and for said County and State, residing therein, duly commissioned and sworn, personally appeared Stephen T. Kazmer, known to me to be Attorney-in-Fact of Frontier Insurance Company, the corporation described in and that executed the within and foregoing instrument, and known to me to be the person who executed the said instrument on behalf of the said corporation, and he/she duly acknowledged to me that such corporation executed the same.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal, the day and year stated in this certificate above.

My Commission Expires on March 1, 2001



Notary Public





Region 2

**ACKNOWLEDGEMENT OF NOTIFICATION
OF
HAZARDOUS WASTE ACTIVITY**

01/12/2007

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER:	NYD986899912
INSTALLATION NAME:	TCI OF NY LLC
INSTALLATION ADDRESS :	39 FALLS INDUSTRIAL PARK RD HUDSON, NY 12521
MAILING ADDRESS :	39 FALLS INDUSTRIAL PARK RD HUDSON, NY 12521

EPA Form 8700-12AB (4-80)

**USEPA - REGION 2
RCRA Programs Branch
290 Broadway, 22nd Floor
New York, NY 10007-1866**

**ATTN: RCRA NOTIFICATIONS
Tel : (212) 637-4106
Fax: (212) 637-3056**

**TO: TCI OF NY LLC
or Current Occupant
ATTN: BRUCE VETRO
39 FALLS INDUSTRIAL PARK RD
HUDSON, NY 12521**

SEND COMPLETED FORM TO: The Appropriate State or EPA Regional Office.	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM			2005 DEC 13 AM 9:25	
1. Reason for Submittal (See instructions on page 13.) MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities) <input checked="" type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report				
2. Site EPA ID Number (page 14)	EPA ID Number NY D 9 8 6 8 9 9 9 1 2				
3. Site Name (page 14)	Name: TCI of NY, LLC				
4. Site Location Information (page 14)	Street Address: 39 Falls Industrial Park Road				
	City, Town, or Village: Hudson		State: NY		
	County Name: Columbia		Zip Code: 12521		
5. Site Land Type (page 14)	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other				
6. North American Industry Classification System (NAICS) Code(s) for the Site (page 14)	A. 5 0 9 3		B.		
	C.		D.		
7. Site Mailing Address (page 15)	Street or P. O. Box: 39 Falls Industrial Park Road				
	City, Town, or Village: Hudson				
	State: NY				
	Country: US		Zip Code: 12534		
8. Site Contact Person (page 15)	First Name: Bruce		MI:	Last Name: Vetro	
	Phone Number: 518-828-9997			Extension:	
9. Operator and Legal Owner of the Site (pages 15 and 16)	A. Name of Site's Operator: TCI of NY, LLC			Date Became Operator (mm/dd/yyyy): 12/01/2006	
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other				
	B. Name of Site's Legal Owner: TCI Realty of NY, LLC			Date Became Owner (mm/dd/yyyy): 12/01/2006	
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other				

9. Legal Owner (Continued) Address	Street or P. O. Box: <u>39 Falls Industrial Park Road</u>	
	City, Town, or Village: <u>Hudson</u>	
	State: <u>NY</u>	
	Country: <u>United States</u>	Zip Code: <u>12534</u>

10. Type of Regulated Waste Activity

Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)

A. Hazardous Waste Activities

Complete all parts for 1 through 6.

Y ☒ N ☐ 1. Generator of Hazardous Waste

If "Yes", choose only one of the following - a, b, or c.

☐ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.)
of non-acute hazardous waste; or☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.)
of non-acute hazardous waste; or☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.)
of non-acute hazardous waste

In addition, indicate other generator activities.

Y ☒ N ☐ d. United States Importer of Hazardous WasteY ☒ N ☐ e. Mixed Waste (hazardous and radioactive) GeneratorY ☒ N ☐ 2. Transporter of Hazardous WasteY ☒ N ☐ 3. Treater, Storer, or Disposer of
Hazardous Waste (at your site) Note:
A hazardous waste permit is required for
this activity.Y ☒ N ☐ 4. Recycler of Hazardous Waste (at your
site)Y ☒ N ☐ 5. Exempt Boiler and/or Industrial
Furnace

If "Yes", mark each that applies.

☐ a. Small Quantity On-site Burner
Exemption☐ b. Smelting, Melting, and Refining
Furnace ExemptionY ☒ N ☐ 6. Underground Injection Control

B. Universal Waste Activities

Y ☒ N ☐ 1. Large Quantity Handler of Universal Waste (accumulate
5,000 kg or more) [refer to your State regulations to
determine what is regulated]. Indicate types of universal
waste generated and/or accumulated at your site. If "Yes",
mark all boxes that apply:

	Generate	Accumulate
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

Y ☒ N ☐ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

Mark all boxes that apply.

Y ☒ N ☐ 1. Used Oil Transporter
If "Yes", mark each that applies.
☒ a. Transporter
☒ b. Transfer FacilityY ☒ N ☐ 2. Used Oil Processor and/or Re-refiner
If "Yes", mark each that applies.
☐ a. Processor
☐ b. Re-refinerY ☒ N ☐ 3. Off-Specification Used Oil BurnerY ☒ N ☐ 4. Used Oil Fuel Marketer
If "Yes", mark each that applies.
☒ a. Marketer Who Directs Shipment of
Off-Specification Used Oil to
Off-Specification Used Oil Burner
☐ b. Marketer Who First Claims the
Used Oil Meets the Specifications

11. Description of Hazardous Wastes (See instructions on page 21.)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

	B					

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

	B					

12. Comments (See instructions on page 21.)

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11).

(See instructions on page 21.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
<i>Bruce Vetro</i>	Bruce Vetro, Facility Manager	12/06/2006

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: October 14, 2015 - 3:33 PM

Version 5.0

User Selection Criteria

Location:	New York, all activities	Activity Location:	None Chosen
Handler ID:	NYD986899912	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 10/14/2015		
Location County Code:	None Chosen	Evaluation Type:	
Location City:		Focus Area:	
Location Zip Code:		Violation Type:	
State District:	None Chosen	Display Code Descrip.:	Yes
Sort Order:	Region, State, Handler Name	Display Universes:	Yes

Results

Data meeting the criteria you selected follows.

Total Pages:7 Total Handlers:1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name: cme_foia.rdf
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed: June 2006
Last Updated: May 2012
Contact: rcrainfo.help@epa.gov
Tables Used: cmecomp3, ccitation3, hreport_univ5, lu_citation, lu_state, hid_groups
Libraries: none

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

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T C I OF NY LLC

County Name / Code: COLUMBIA / NY021

NYD986899912

Location: 39 FALLS INDUSTRIAL PARK RD; HUDSON, NY 12534

REGION 02

Mailing: 39 FALLS INDUSTRIAL PARK RD; HUDSON, NY 12534

Activity Location: AL	State District:	Accessibility:	Non-Notifier:	Extract Flag: Y	Active Site: N
Generator: N	Transporter:	Operating TSDF: -----	IC In Place: N	El Indicator (HE / GW)N / N	
Short-Term Gen: N	Transfer Facility: N	Offsite Receiver: N	HSM: N	Subpart K: ----	
Full Enforcement: -----	Converter: -----	State Unaddressed SNC: N	EPA Unaddressed SNC: N		
CA Wrkld: N	State TSDF: -----	State Addressed SNC: N	EPA Addressed SNC: N		
Active State Gen: N		State SNC w/Comp Sched: N	EPA SNC w/Comp Sched: N		

Evaluations With No Violations:

NRR Evaluation 01/14/2014	Activity Location: AL	By: State	Identifier: 001	Person: AOO	Branch:	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 01/14/2014	Focus Area:	
NRR Evaluation 01/06/2011	Activity Location: AL	By: State	Identifier: 001	Person: AOO	Branch:	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 01/06/2011	Focus Area:	
NRR Evaluation 01/16/2008	Activity Location: AL	By: State	Identifier: 001	Person:	Branch: SWU	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 01/16/2008	Focus Area:	
NRR Evaluation 01/31/2007	Activity Location: AL	By: State	Identifier: 001	Person: AOO	Branch: SWU	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 01/31/2007	Focus Area:	
FCI Evaluation 10/14/2004	Activity Location: AL	By: State	Identifier: 001	Person: AOO	Branch: SWU	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area: V3	

T C I OF NY LLC

County Name / Code: COLUMBIA / NY021

NYD986899912

Location: 39 FALLS INDUSTRIAL PARK RD; HUDSON, NY 12534

REGION 02

Mailing: 39 FALLS INDUSTRIAL PARK RD; HUDSON, NY 12534

Activity Location: NJ	State District:	Accessibility:	Non-Notifier:	Extract Flag: Y	Active Site: N
Generator: N	Transporter:	Operating TSDF: -----	IC In Place: N	El Indicator (HE / GW)N / N	
Short-Term Gen: N	Transfer Facility: N	Offsite Receiver: N	HSM: N	Subpart K: ----	
Full Enforcement: -----	Converter: -----	State Unaddressed SNC: N	EPA Unaddressed SNC: N		
CA Wrkld: N	State TSDF: -----	State Addressed SNC: N	EPA Addressed SNC: N		
Active State Gen: N		State SNC w/Comp Sched: N	EPA SNC w/Comp Sched: N		

Evaluations With No Violations:

FCI Evaluation 04/22/2006	Activity Location: NJ	By: State	Identifier: 001	Person: COBH	Branch: T	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 04/22/2006	Focus Area: RTI	

* Note: Penalty amount may not reflect all violations cited.

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T C I OF NY LLC

County Name / Code: COLUMBIA / NY021

NYD986899912

Location: 39 FALLS INDUSTRIAL PARK RD; HUDSON, NY 12534

REGION 02

Mailing: 39 FALLS INDUSTRIAL PARK RD; HUDSON, NY 12534

Activity Location: NY	State District: NYSDEC R4	Accessibility:	Non-Notifier:	Extract Flag: Y	Active Site: Y
Generator: N	Transporter: Y	Operating TSDF: -----	IC In Place: N	El Indicator (HE / GW): N / N	
Short-Term Gen: N	Transfer Facility: N	Offsite Receiver: N	HSM: N	Subpart K: ----	
Full Enforcement: -----	Converter: -----	State Unaddressed SNC: N	EPA Unaddressed SNC: N		
CA Wrkld: N	State TSDF: -----	State Addressed SNC: N	EPA Addressed SNC: N		
Active State Gen: N		State SNC w/Comp Sched: N	EPA SNC w/Comp Sched: N		

Violation: Activity Location: NY	Type: 262.A	Determined Date: 07/10/2003	Determined by Agency: State	Responsible Agency: State
Scheduled Compliance Date:		Actual Compliance Date: 07/21/2003	RTC Qualifier: DOCUMENTED	Sequence Number: 1
Former Citation - SR - 373-3.4(e)				
CEI Evaluation 07/10/2003	Activity Location: NY	By: State	Identifier: 001	Person: NYCVR
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:
				Branch: R4
				Found Violation: YES
				Focus Area:
Enforcement: Activity Location: NY	Type: 120	Action Date: 07/18/2003	Identifier: 001	
Docket:	Agency: State	Responsible Person: NYCVR	Branch: R4	
CA Component: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:	

Evaluations With No Violations:

CEI Evaluation 08/31/2015	Activity Location: NY	By: State	Identifier: 001	Person: NYHBR	Branch: R4	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 08/31/2015		Focus Area:
CEI Evaluation 05/02/2014	Activity Location: NY	By: State	Identifier: 001	Person: NYHBR	Branch: R4	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 05/02/2014		Focus Area:
CEI Evaluation 05/30/2013	Activity Location: NY	By: State	Identifier: 001	Person: NYHBR	Branch: R4	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 05/30/2013		Focus Area:
CEI Evaluation 05/30/2013	Activity Location: NY	By: State	Identifier: 002	Person: NYHBR	Branch: R4	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 05/30/2013		Focus Area:
FRR Evaluation 03/15/2013	Activity Location: NY	By: EPA	Identifier: 001	Person: R2NR	Branch: RCB	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 03/15/2013		Focus Area:
CEI Evaluation 04/10/2009	Activity Location: NY	By: State	Identifier: 001	Person: NYHBR	Branch: R4	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 04/10/2009		Focus Area:
CEI Evaluation 04/21/2008	Activity Location: NY	By: State	Identifier: 001	Person: NYHBR	Branch: R4	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 04/21/2008		Focus Area:
CEI Evaluation 10/18/2006	Activity Location: NY	By: State	Identifier: 005	Person: NYCVR	Branch: R4	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 10/18/2006		Focus Area:

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FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

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T C I OF NY LLC, NYD986899912, HUDSON, NY, continued -

CEI Evaluation	11/30/2004	Activity Location: NY	By: State	Identifier: 001	Person: NYHBR	Branch: R4	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:

Total Number of Handlers: 1

Total Number of Activity Locations: 3

*** End of Report ***

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FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

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Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

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FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

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Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):	
Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:	
Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier.
X	indicates that the handler is a non-notifier.

Violation Type	Description
262.A	GENERATORS - GENERAL

Evaluation Type	Type Description
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE
FCI	FOCUSED COMPLIANCE INSPECTION
FRR	FINANCIAL RECORD REVIEW
NRR	NON-FINANCIAL RECORD REVIEW

Focus Area	Description
RTI	REMOTE TRANSPORTER INSPECTION
V3	CONVERTED FROM V2 RCRAINFO

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

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Description of codes used on the report:

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL

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